OCTA

12 June 2006

Mr. Jonathan Nadler
Program Manager II
Southern California Association of Governments
818 W. Seventh Street, 12th Floor (Main Office)
Los Angeles, CA 90017

Subject: State Route 91 (SR-91) Eastbound Widening Improvements (District 12 EA 0G0400, District 8 EA 0E8000) Particulate Matter Conformity

Dear Mr. Nadler;

The Orange County Transportation Authority (OCTA) proposes to construct improvements to widen eastbound State Route 91 (the Riverside Freeway) from SR-241 and SR-71. This project has a length of 11.1 km (6.9 mi), and passes through the Cities of Anaheim and Yorba Linda, in Orange County, California and the City of Corona in the Riverside County, California. In general, the SR-91 Eastbound Widening Improvements propose to add one eastbound through lane from the northbound SR-241 on-ramp to the SR-71 ramps.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in PM2.5 and PM10 nonattainment and maintenance areas (71 Federal Register [FR] 12458). Transportation conformity is required under Clean Air Act section 176(c) 42 United States Code (U.S.C.) 7506(c) to ensure that federally supported highway and transit project activities are consistent with ("conform to") the purpose of the state quality implementation plan (SIP). EPA's transportation conformity rule (40 Code of Federal Regulations [CFR] 51.390 and Part 93) establishes the criteria and procedures for determining whether transportation activities conform to the SIP, Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by ail projects in nonattainment and maintenance areas that are subject to transportation conformity. Section 176(c)(I)(B) states that federally-supported transportation projects must not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area."

To meet statutory requirements, the March 10, 2006 final rule requires PM2.5 and PM10

hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative PM2.5 and PM10 hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, EPA determined that projects not identified in 40 CFR 93.123(b)(1) as projects of air quality concern have also met statutory requirements without any further hot-spot analyses (40 CFR 93.1 16(a). The final rule defines the projects of air quality concern that require a PM2.5 and PM10 hot-spot analysis in 40 CFR 93.123(b)(1) as:[1]

(i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;

(ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;

(iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;

(iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and

(v) Projects in or affecting locations, areas, or categories of sites which are identified in tile PM2.5 or PM10 applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

This segment of SR-91 does not directly serve any ports, rail yards or other significant sources of particulate matter. Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action

The proposed project would not conflict with an applicable plan, policy, or regulation of an agency with jurisdiction over the project. The proposed project is also consistent with Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) and is intended to meet the traffic needs in the area based on local land use plans. Additionally, this project is identified in the freeway chokepoint program. It is proposed as a "Category 4A" project, and is being paid for by local funds, 91 Express Toll Lanes revenue, for current phase. The project future phases will be proposed to be paid for by a combination of funds consisting of local funds (91 Express Lane revenues, Measure M) Traffic Congestion Relief Program (TCRP) and State Transportation Improvement Plan (STIP) and federal funds. This project is needed to maintain acceptable level of service (LOS),

[1] U.S. Environmental Protection Agency and Federal Highway Administration, Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM10 and PM10 Nonattainment and Maintenance Areas, (PM Protocol), March 2006, Appendix A.

and to implement part of the improvements recommended in the Transportation Concept Report (1999) and the State Route 91 Implementation Plan which was last updated in 2004.

An analysis of PM10 Hotspots for the project was prepared using the previous FHWA/EPA guidance and the Caltrans/UC Davis PM10 Hotspot Protocol. The new guidelines state that PM10 hotspot analyses prepared under the previous guidance at the time the new guidance was released do not need to be updated. Therefore, the already prepared PM10 hotspot analysis will be retained. This analysis concluded that the project would not result in a PM10 Hotspot

The project does not qualify as a project of air quality concern because the project would not result in a significant increase in the number of diesel busses and diesel trucks that would utilize the facility especially when considered in conjunction with the additional capacity provided by the project. The project proposes the addition of a lane to eastbound SR-91 between SR-241 and SR-71. The traffic study for the project shows that traffic volumes in 2010 will not change with the project compared to no-build conditions. In 2030, the traffic study projects that ADT volumes will increase by approximately 3.3% with the project over no-build conditions. This represents in increase of approximately 440 daily trucks with the project over the no project conditions in 2030. This increase is not significant when considered in conjunction with the capacity that the project will add to SR-91. The project will increase the total number of eastbound lanes from 6 to 7 from Coal Canyon to SR-71. This represents an increase in capacity of 16.7%. The traffic study concludes that the project will result in less congestion and higher average speeds. Lower delay and higher speeds result in lower emissions that will offset the projected small increase in trucks with the project.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic to the area and is not considered a project of significant concern per the definition contained within 40 CFR 93.123(b)(i). Thus, a less than significant impact with respect to PM2.5 would occur. OCTA respectfully requests SCAG's consideration and acceptance of this letter as formal validation of the project's insignificant contribution of PM2.5. To facilitate review by the Transportation Conformity Working Group, we are attaching the PM Conformity Hot Spot Analysis - Project Summary for Interagency Consultation form with detailed information supporting our conclusion.

Sincerely,

Afshad M. Rashedi, P.E., PMP
Section Manager, Project Development
Orange County Transportation Authority

Attachments

cc: Jennifer Bergener, Capital Programs - OCTA
Darrell Johnson, Programming, Development and Commuter Rail – OCTA
Marzieh Ghandahari, SR -91 Consultant Project Manager – Kimley-Horn and Assoc.
Leslie Manderscheid, Environmental Planning - Caltrans

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

Project Description *from TIP, RTP, and/or project documents* **MPO ID#:** ORA120336

SR91 – Add eastbound auxiliary lane between SR241 & SR71 and improve NB SR71 Connector from SR91 – widen no lane addition. (Note that project has since been redefined as a lane addition rather than auxiliary lane addition and RTIP and RTP are to be modified to reflect this.

Type of project *see list below*

Change to existing state highway – Lane Addition

County:	**Narrative Location/Route & Postmiles:** SR-91 between SR-241 and SR-71. 12-ORA-91 KP 25.628/32.034 (PM15.925/19.905) - 8-RIV-91 KP 0.000/4.682 (PM 0.000/2.909)
Orange & Riverside	**Caltrans Projects – EA#:** DISTRICT 12 EA 0G0400, DISTRICT 8 EA 0E800

Lead Agency: Orange County Transportation Authority

Contact Person	**Phone#**	**Fax#**	**Email**
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Decision Desired *Check appropriate box below*

PM2.5		**MAYBE Project of Air Quality Concern**	X	**NOT Project of Air Quality Concern**	
PM10		**MAYBE Project of Air Quality Concern**		**NOT Project of Air Quality Concern**	

Federal Action for which PM Analysis is Needed *Check appropriate box and describe in Comments below*

	CE		**EA or Draft EIS**	X	**FONSI or Final EIS**		**PS&E or Construction**		**Other**

Scheduled Date of Federal Action: March, 2007

Current Programming Dates *as appropriate*

	PE/Environmental	**ENG**	**ROW**	**CON**
Start	2004	August, 2007	November, 2008	June, 2009
End	May, 2007	October, 2008	January, 2009	October, 2010

Project Purpose and Need (Summary): *Attach additional sheets as necessary*

The purpose of this project is to improve weaving between SR-241 and SR-91, as well as reduce the number of vehicles in the SR-91 mainline traffic flow that would be exiting at Green River Drive and SR-71. The standard width lanes and shoulders would enhance safety within the project area.

There are three choke point locations that significantly impact traffic operations and are the primary cause of congestion within the study area. At the junction of northbound SR- 241 and eastbound SR-91 there are five general-purpose lanes on SR-91 that drops to four lanes after a distance of approximately 1.6-krn (near Coal Canyon Road). Thus, the right lane acts as a long merge lane in this area. There is another lane drop along eastbound SR-91 immediately after the connector to northbound SR-71. In addition to these choke points along eastbound SR-91, there is a choke point on northbound SR-71 north of where the connectors from eastbound and westbound SR-91 merge. During the P.M. peak traffic period traffic backs up on these connectors and onto SR-91 in both directions. The purpose of this project is to improve flow by relieving these choke points.

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Surrounding Land Use/Traffic Generators

The majority of the uses in the immediate vicinity of the project area are residential uses, however there are small to moderate industrial parks just outside the project area along SR-91 at both ends (i.e.; to the east and west) of the project area. SR-91 is a primary connector between Orange County and the inland

LOS, AADT, % trucks, truck AADT of proposed facility (opening year)

2010 Projected Traffic Volumes

Segment	No Project AADT	No Project Truck AADT	No Project LOS (AM/PM)	With Project ADT	With Project Truck ADT	With Project LOS (AM/PM)
SR-91						
NB 241 Connector to Coal Canyon	176,630	10,598	D/D	176,630	10,598	D/D
Coal Canyon to Green River Dr.	171,827	10,310	E/E	171,827	10,310	E/E
Green River Dr. to SR-71	197,774	11,866	E/E	197,774	11,866	D/D

Notes:

AADT was estimated based on the AM and PM Peak hour traffic volumes from the traffic study prepared for the project ("Eastbound SR-91 Lane Addition from SR-241 to SR-71 Final Traffic Analysis Report for the Project Report (PR) and Environmental Document (ED)" Meyer, Mohaddes Associates, February 2006). The traffic study prepared fo the project did not project AADT's for opening year. The ratio between the average of the AM and PM peak hour volumes and the AADT for the year 2030 were used to estimate the 2010 AADT shown in the table.

LOS is from the traffic study prepared for the project ("Eastbound SR-91 Lane Addition from SR-241 to SR-71 Final Traffic Analysis Report for the Project Report (PR) and Environmental Document (ED)" Meyer, Mohaddes Associates, February 2006).

Truck AADT based on existing data from Caltrans Traffic and Vehicle Data Systems showing for existing conditions 6% of AADT is trucks on SR-91 west of SR-71. No adjustments were made to account for diesel fueled trucks vs. gas fueled trucks. Further, no data was available to estimate future truck percentage so the existing percentage was used.

Additional traffic data details are provided in the attachment.

LOS, AADT, % trucks, truck AADT of proposed facility (RTP horizon year)

2030 Projected Traffic Volumes

Segment	No Project AADT	No Project Truck AADT	No Project LOS (AM/PM)	With Project ADT	With Project Truck ADT	With Project LOS (AM/PM)
SR-91						
NB 241 Connector to Coal Canyon	222,030	13,322	F/F	229,340	13,760	F/F
Coal Canyon to Green River Dr.	222,030	13,322	F/F	229,340	13,760	F/F
Green River Dr. to SR-71	210,050	12,603	F/F	217,350	13,041	D/F

Notes:

AADT and LOS are from the traffic study prepared for the project. ("Eastbound SR-91 Lane Addition from SR-241 to SR-71 Final Traffic Analysis Report for the Project Report (PR) and Environmental Document (ED)" Meyer, Mohaddes Associates, February 2006)

Truck AADT based on existing data from Caltrans Traffic and Vehicle Data Systems showing for existing conditions 6% of AADT is trucks on SR-91 west of SR-71. No adjustments were made to account for diesel fueled trucks vs. gas fueled trucks. Further, no data was available to estimate future truck percentage so the existing percentage was used.

Additional traffic data details are provided in the attachment.

If facility is interchange(s) or intersection(s), cross-street AADT, % trucks, truck AADT (opening year): not applicable

If facility is interchange(s) or intersection(s), cross-street AADT, % trucks, truck AADT (RTP horizon year): not applicable

Describe potential traffic redistribution effects of congestion relief

The traffic study prepared for the project shows that there will be considerable increases in ramp traffic volumes at Gypsum Canyon Road and Green River Drive with the project. However, the majority of uses in the vicinity of these ramps are residential and therefore much of the traffic on these ramps would be passenger vehicles. The project would also increase traffic on SR-241 and SR-71. However, truck volumes on SR-241 and SR-71 would not be expected to exceed 10,000 AADT and therefore, these facilities would not be considered air quality concerns per the PM2.5 hotspot guidelines. (additional information is provided in the attachment).

Comments/Explanation/Details

Attach additional sheets as necessary; include narrative reason why POAQC or Not POAQC decision is appropriate

The project does not qualify as a project of air quality concern because the project would not result in a significant increase in the number of diesel busses and diesel trucks that would utilize the facility especially when considered in conjunction with the additional capacity provided by the project. The project proposes the addition of a lane to eastbound SR-91 between SR-241 and SR-71. The traffic study for the project shows that traffic volumes in 2010 will not change with the project compared to no-build conditions. In 2030, the traffic study projects that ADT volumes will increase by approximately 3.3% with the project over no-build conditions. This represents in increase of approximately 440 daily trucks with the project over the no project conditions in 2030. This increase is not significant when considered in conjunction with the capacity that the project will add to SR-91. The project will increase the total number of eastbound lanes from 6 to 7 from Coal Canyon to SR-71. This represents an increase in capacity of 16.7%. The traffic study concludes that the project will result in less congestion and higher average speeds. Lower delay and higher speeds result in lower emissions that will offset the projected small increase in trucks with the project. Therefore, the proposed project meets the Clean Air Act requirements and 40 CFR 93.116 without any explicit hot-spot analysis and the proposed project would not create a new, or worsen an existing, PM2.5 violation.